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 NAVIGATORS SPECIALTY
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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

NAVIGATORS SPECIALTY INSURANCE
 COMPANY,

Plaintiff,

vs.

INTUITIVE SURGICAL, INC., a Delaware
 corporation,

Defendant.

) Case No. 3:13-cv-04863-JST

)
) **STIPULATION TO MODIFY EXPERT**
) **DISCOVERY DEADLINES; ~~PROPOSED~~**
) **ORDER**

) Judge: Honorable Jon S. Tigar

1 NAVIGATORS SPECIALTY INSURANCE)
 COMPANY, a Delaware corporation,)
 2)
 Plaintiff,)
 3)
 vs.)
 4)
 INTUITIVE SURGICAL, INC., a Delaware)
 corporation,)
 5)
 Defendant.)
 6)
 7)

8 The parties to the above-entitled action, through their counsel of record, hereby stipulate as
 9 follows:

10 **RECITALS**

11 1. At a Case Management Conference held on April 23, 2014, the Court adopted the
 12 pre-trial schedule proposed by the parties in their Joint Case Management Statement.

13 2. That schedule established the following deadlines:

14 Designation of Experts: January 5, 2015

15 Designation of Rebuttal Experts: February 9, 2015

16 Close of Fact and Expert Discovery: March 9, 2015

17 3. Upon further consideration, the parties agree that it would be beneficial to wait until
 18 after the close of fact discovery to designate experts.

19 4. In light of this agreement, the parties agree and hereby propose to modify the existing
 20 expert discovery deadlines as follows:

21 Close of Fact Discovery: March 9, 2015

22 Designation of Experts: March 16, 2015

23 Expert Reports Due: April 6, 2015

24 Designation of Rebuttal Experts: April 22, 2015

25 Rebuttal Reports Due: May 6, 2015

26 Close of Expert Discovery: May 29, 2015

27 5. The parties further stipulate that there is a chance that if the fact discovery deadline is
 28 changed, it may require a further adjustment of the expert witness schedule.

1 IT IS SO STIPULATED.

2 Dated: January 5, 2015

HINSHAW & CULBERTSON LLP

3 /s/ John S. Pierce

4 JOHN S. PIERCE

5 DAVID J. McMAHON

PETER J. FELSENFELD

6 Attorneys for Plaintiff

NAVIGATORS SPECIALTY

7 INSURANCE COMPANY

8 Dated: January 5, 2015

COZEN & O'CONNOR

9 /s/ Charles E. Wheeler

10 THOMAS M. JONES

11 CHARLES E. WHEELER

AMANDA M. LORENZ

12 Attorneys for Plaintiff

ILLINOIS UNION

13 INSURANCE COMPANY

14 Dated: January 5, 2015

15 SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP

16 /s/ Raoul D. Kennedy

17 ALLEN J. RUBY

18 RAOUL D. KENNEDY

THOMAS E. HAROLDSON

19 Attorneys for Defendant

INTUITIVE SURGICAL, INC.

ORDER

Based on the foregoing Stipulation, and good cause appearing therefor,

IT IS HEREBY ORDERED that the existing expert discovery deadlines will be modified as follows:

Close of Fact Discovery: March 9, 2015

Designation of Experts: March 16, 2015

Expert Reports Due: April 6, 2015

Designation of Rebuttal Experts: April 22, 2015

Rebuttal Reports Due: May 6, 2015

Close of Expert Discovery: May 29, 2015

DATED: January 5, 2015

